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6 Attorneys for Plaintiff

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
8
9 IN AND FOR THE COUNTY OF MARICOPA COUNTY

10 STATE OF ARIZONA,

11 Plaintiff,

12 v.

13 DENNIS LYNN LARSON (001),

14 DWIGHT G. GRUDIER (002)

15 Defendants.

No.

INDICTMENT

59 SGJ 60

CHARGING VIOLATIONS OF:

Count 1: Illegally Controlling an
Enterprise, A.R.S. § 13-2312
Class 2 felony (001), (002)

Count 2: Fraudulent Schemes and
Artifices, A.R.S. § 13-2310
Class 2 Felony (001), (002)

Count 3: Theft, A.R.S. §13-1802
Class 3 Felony (001), (002)

Counts 4-8: Theft, A.R.S. §13-1802
Class 2 Felonies (001)

Count 9: Theft, A.R.S. §13-1802
Class 2 Felony (001), (002)

Count 10: Money Laundering
A.R.S. § 13-2317 Class 2 Felony (001)

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24 The Arizona State Grand Jury accuses defendants DENNIS LYNN LARSON and
25 DWIGHT G. GRUDIER , charging on this 12th day of September, 2006 that in or from
26 Maricopa County, Arizona:
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1 Count 1

2 Between May 12, 1998 and September 12, 2006, defendants **DENNIS LYNN**
3 **LARSON** and **DWIGHT G. GRUDIER** were associated with an enterprise and
4 conducted its affairs through racketeering, or participated directly or indirectly in the
5 conduct of an enterprise that they knew was being conducted through racketeering in
6 violation of A.R.S. §§13-2312, 13-2301, 13-301, 13-302, 123-303, 13-304, 13-701, 13-
7 702, 13-702.02 and 13-801.

8 Such conduct occurred when defendants **DENNIS LYNN LARSON** and **DWIGHT**
9 **G. GRUDIER** were associated with an enterprise (known at various times by the names
10 Dynamic Concepts International Inc. and Worldwide Humanitarian Organization LLC, but
11 which in reality was one enterprise of defendants **DENNIS LYNN LARSON** and
12 **DWIGHT G. GRUDIER**) and conducted its affairs through racketeering, or participated
13 directly or indirectly in the conduct of an enterprise that they knew was being conducted
14 through racketeering

15 Count 2

16 Between May 12, 1998 and September 12, 2006, defendants **DENNIS LYNN**
17 **LARSON** and **DWIGHT G. GRUDIER**, pursuant to a scheme or artifice to defraud,
18 knowingly obtained a benefit by means of fraudulent pretenses, representations, promises,
19 or material omissions, in violation of A.R.S. §§13-2310, 13-2301, 13-301, 13-302, 123-
20 303, 13-304, 13-701, 13-702, 13-702.02 and 13-801.

21 Such conduct occurred when defendants **DENNIS LYNN LARSON** and **DWIGHT**
22 **G. GRUDIER** obtained approximately \$971,000 from Dorothy Brenner/Donald Dykas,
23 Elizabeth Jackson, Brandon Arduino, Ruth Conrady, Shirley Prescott, and Peter Nordstrom
24 by means of fraudulent pretenses, representations, promises, or material omissions.

25 Count 3

26 Between January 7, 2003 and September 12, 2006, defendants **DENNIS LYNN**
27 **LARSON** and **DWIGHT G. GRUDIER** controlled property of another with the intent to
28

1 deprive the other person of such property, in violation of A.R.S. §§13-1802(A)(1), 13-
2 1801, 13-701, 13-702, 13-702.02 and 13-801.

3 Such conduct occurred when defendants **DENNIS LYNN LARSON** and **DWIGHT**
4 **G. GRUDIER** failed to return a \$20,000 principal investment upon Donald Dykas'
5 request, pursuant to an agreement to do so.

6 Count 4

7 Between June 23, 2000 and September 12, 2006, defendant **DENNIS LYNN**
8 **LARSON** converted for an unauthorized term or use, property of another entrusted to the
9 defendant or placed in defendant's possession for a limited, authorized term or use, with a
10 value of \$25,000 or more, in violation of A.R.S. §§ 13-1802(A)(2), 13-1801, 13-301, 13-
11 302, 123-303, 13-304, 13-701, 13-702, 13-702.02 and 13-801.

12 Said conduct occurred when defendant **DENNIS LYNN LARSON** obtained
13 \$175,000 from Elizabeth Jackson, and did not use the money for the agreed purpose of
14 investment on her behalf.

15 Count 5

16 Between May 4, 2001 and September 12, 2006, defendant **DENNIS LYNN**
17 **LARSON** controlled property of another with the intent to deprive the other person of such
18 property, in violation of A.R.S. §§13-1802(A)(1), 13-1801, 13-701, 13-702, 13-702.02 and
19 13-801.

20 Such conduct occurred when defendant **DENNIS LYNN LARSON** failed to return
21 a \$100,000 principal investment upon Brandon Arduino's request, pursuant to an
22 agreement to do so.

23 Count 6

24 Between August 5, 1999 and September 12, 2006, defendant **DENNIS LYNN**
25 **LARSON** converted for an unauthorized term or use, property of another entrusted to the
26 defendant or placed in defendant's possession for a limited, authorized term or use, with a
27 value of \$25,000 or more, in violation of A.R.S. §§ 13-1802(A)(2), 13-1801, 13-701, 13-
28 702, 13-702.02 and 13-801.

1 Said conduct occurred when defendant **DENNIS LYNN LARSON** obtained
2 \$295,000 from Ruth Conrady, and did not use the money for the agreed purpose of
3 investment on her behalf.

4 Count 7

5 Between December 10, 2001 and September 12, 2006, defendant **DENNIS LYNN**
6 **LARSON** converted for an unauthorized term or use, property of another entrusted to the
7 defendant or placed in defendant's possession for a limited, authorized term or use, with a
8 value of \$25,000 or more, in violation of A.R.S. §§ 13-1802(A)(2), 13-1801, 13-701, 13-
9 702, 13-702.02 and 13-801.

10 Said conduct occurred when defendant **DENNIS LYNN LARSON** used \$31,500
11 obtained from Shirley Prescott, and did not use the money for the agreed purpose of
12 investment on her behalf, but instead used it to pay a debt he owed to Ruth Conrady.

13 Count 8

14 Between October 25, 2001 and September 12, 2006, defendant **DENNIS LYNN**
15 **LARSON** converted for an unauthorized term or use, property of another entrusted to the
16 defendant or placed in defendant's possession for a limited, authorized term or use, with a
17 value of \$25,000 or more, in violation of A.R.S. §§ 13-1802(A)(2), 13-1801, 13-701, 13-
18 702, 13-702.02 and 13-801.

19 Said conduct occurred when defendant **DENNIS LYNN LARSON** obtained
20 \$250,000 from Shirley Prescott, and did not use the money for the agreed purpose of
21 investment on her behalf.

22 Count 9

23 Between February 27, 2003 and September 12, 2006, defendants **DENNIS LYNN**
24 **LARSON** and **DWIGHT G. GRUDIER** converted for an unauthorized term or use,
25 property of another entrusted to the defendants or placed in defendants' possession for a
26 limited, authorized term or use, with a value of \$25,000 or more, in violation of A.R.S. §§
27 13-1802(A)(2), 13-1801, 13-301, 13-302, 123-303, 13-304, 13-701, 13-702, 13-702.02 and
28 13-801.

1 Said conduct occurred when defendants **DENNIS LYNN LARSON** and **DWIGHT**
2 **G. GRUDIER** obtained \$100,000 from Peter Nordstrom, and did not use the money for
3 the agreed purpose of investment on his behalf.

4 Count 10

5 Between June 30, 2000 and October 31, 2000 defendant **DENNIS LYNN LARSON**
6 knowingly initiated, organized, planned, financed, directed, managed, supervised or was in
7 the business of money laundering in violation of A.R.S. §§13-2317(A), 13-2301, 13-701,
8 13-702, 13-702.02 and 13-801.

9 Such conduct occurred when defendant **DENNIS LYNN LARSON** caused \$175,000
10 of Elizabeth Jackson's money to be moved from a bank account of Great Western Partners
11 to an account held by the Worldwide Humanitarian Organization LLC, to an account held
12 by Dynamic Concepts International, Inc., and then to defendant **DENNIS LYNN**
13 **LARSON** and to other investors unrelated to Elizabeth Jackson.

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15 Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described
16 above were committed in Maricopa County, Arizona.

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18 _____
19 (A "True Bill")

20 TERRY GODDARD
21 ATTORNEY GENERAL
22 STATE OF ARIZONA

23 Dated: _____

24 _____
25 GAIL THACKERAY
26 Assistant Attorney General

27 _____
28 Foreperson of the State Grand Jury